

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	
	:	
Debtors.	:	
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In re:	:	SIPA
	:	Case No. 08-01420 (SCC)
LEHMAN BROTHERS INC.,	:	
	:	
Debtor.	:	
-----	X	
LEHMAN BROTHERS HOLDINGS INC. and	:	Adversary Proceeding
OFFICIAL COMMITTEE OF UNSECURED	:	Case No. 10-03266 (SCC)
CREDITORS OF LEHMAN BROTHERS HOLDINGS	:	
INC., <i>et al.</i> ,	:	
	:	
Plaintiff and	:	
Plaintiff Intervenor,	:	
	:	
-against-	:	
	:	
JPMORGAN CHASE BANK, N.A.,	:	
	:	
Defendant.	:	
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LEHMAN BROTHERS HOLDINGS INC., LEHMAN	:
BROTHERS SPECIAL FINANCING INC., LEHMAN	:
BROTHERS COMMODITY SERVICES INC., LEHMAN	:
OFFICIAL COMMITTEE OF UNSECURED	:
CREDITORS OF LEHMAN BROTHERS HOLDINGS	:
INC., <i>et al.</i> ,	:
	:
Plaintiffs,	:
	:
-against-	:
	:
JPMORGAN CHASE BANK, N.A., J.P. MORGAN	:
MARKETS LIMITED (F/K/A BEAR STEARNS	:
INTERNATIONAL LIMITED), J.P. MORGAN	:
SECURITIES LTD., J.P. MORGAN VENTURES	:
ENERGY CORPORATION, JP MORGAN CHASE	:
AND CO., JPMORGAN BANK DUBLIN (F/K/A	:
BEAR STEARNS BANK PLC), BEAR STEARNS	:
CREDIT PRODUCTS INC. and BEAR STEARNS	:
FOREX INC.,	:
	:
Defendants.	:
-----	X

STIPULATION AND ORDER AMENDING PROTECTIVE ORDERS

This Stipulation is entered into by and between the undersigned counsel, acting for and on behalf of their respective clients: (a) Lehman Brothers Holdings Inc. (“LBHI”) and (b) JPMorgan Chase Bank, N.A. (“JPMorgan” and, together with LBHI, the “Parties”).

WHEREAS, on May 31, 2017, the Court so-ordered a stipulation [Case No. 08-13555, Dkt. # 55408] (the “Second Extension Stipulation”) in which LBHI and JPMorgan agreed to modify Paragraph 17 of the 2010 Adversary Proceeding Protective Order¹ and Paragraph 15 of the 2012 Adversary Proceeding Protective Order; and

¹ Defined terms used but not defined herein shall have the meanings ascribed to them by the Second Extension Stipulation.

WHEREAS, the Parties have entered into this Stipulation and agree to be bound
by its terms;

NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED, AND UPON
COURT APPROVAL HEREOF, IT IS ORDERED THAT:

The 120-day deadline in the May 31 Order is hereby extended by an additional
forty-five (45) days.

DATED: June 29, 2017

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By s/ Tyler G. Whitmer

Tyler G. Whitmer

Counsel for Lehman Brothers Holdings Inc.

DATED: June 29, 2017

WACHTELL, LIPTON, ROSEN & KATZ

By s/ Ian Boczko

Ian Boczko

Counsel for JPMorgan Chase Bank, N.A.

IT IS SO ORDERED:

Dated: July 6, 2017

/S/ Shelley C. Chapman

HON. SHELLEY C. CHAPMAN

UNITED STATES BANKRUPTCY JUDGE